

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA

EMILIA STRONG SYKES, et al.

Plaintiffs,

v.

VERNON SYKES, et al.

Defendants.

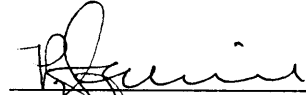
Case No. 3:06 CV 582-MHT

Judge Thompson

**MOTION FOR EXPEDITED  
DISCOVERY AND SHORTENED NOTICE**

In accordance with the provisions of Fed. R. Civ. P. 26(d), Plaintiffs in this action move for expedited discovery and shortened notice of the time frame for responding to discovery requests. A Memorandum in support of this motion is attached.

**Respectfully submitted,**

  
Percy Squire, Esq.( 0022010)  
Percy Squire Co., LLC  
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Counsel for Plaintiffs

**SCANNED**

0870706

**MEMORANDUM**

This is an action for breach of contract and a denial of due process arising from Defendants unlawful revocation of the Title "Miss Tuskegee University" from Plaintiff Emilia Sykes. A July 31, 2006 hearing on Plaintiff's Motion for a Preliminary Injunction has been scheduled. Prehearing briefs are due on July 19, 2006. In order to facilitate briefing and hearing preparation, Plaintiffs desire to conduct limited streamlined discovery. A copy of Plaintiffs' proposed discovery is attached at Exhibit "A". In order to enable Plaintiffs to meet their burden of going forward, it is respectfully requested that the following be ordered:

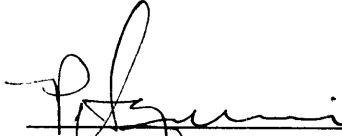
1. Defendants must respond to Plaintiffs' Interrogatories, document requests and requests for admission by July 17, 2006;
2. Plaintiffs may obtain the depositions upon oral examination of the named Defendants and a representative of Defendant Tuskegee University at anytime after July 10, 2006 but before July 28, 2006.

A proposed order is attached as Exhibit "B".

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion For Expedited  
Discovery And Shortened Notice was sent via facsimile to the party below, on the 6th  
day of July, 2006, to the following:

Barbara G. Williams, Esq.  
Vice President for Human Resources Management  
University Legal Counsel  
Tuskegee University  
Tuskegee, Alabama 36088  
Via Facsimile No. (334) 724-4319

  
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Percy Squire  
Counsel for Plaintiffs